

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

TIMOTHY J. DONOHUE,)	Case No. 4:22-CV-4044-LLP
)	
Plaintiff,)	
)	
v.)	PLAINTIFF’S MOTION
)	FOR PARTIAL
ARTHUR J. GALLAGHER & CO., a)	SUMMARY JUDGMENT
Delaware corporation; and BOB)	AND REQUEST FOR
JACOBSEN,)	ORAL ARGUMENT
)	
Defendants.)	

Plaintiff, by his counsel of record, respectfully moves the Court for an Order granting him partial summary judgment to the effect that the termination of his employment by Defendants was violative of public policy. In support of this Motion, Plaintiff refers the Court to all files and proceedings herein, particularly Plaintiff’s Statement of Undisputed Material Facts, the Affidavit of Steven W. Sanford, the Affidavit of Timothy Donohue and Plaintiff’s Memorandum in Support of Motion for Summary Judgment, all filed herewith.

REQUEST FOR ORAL ARGUMENT

Pursuant to L.R. 7.1C, Plaintiff requests oral argument.

Dated: July 7, 2022

CADWELL SANFORD DEIBERT
& GARRY LLP

By /s/ *SW Sanford*_____

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